



Robert L. Slaughter III
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July 20, 2021

VIA ELECTRONIC MAIL

Attorney General Wayne Stenehiem
Office of the Attorney General
Consumer Protection and Antitrust
1050 East Interstate Avenue, Suite 200
Bismarck, ND 58503-5574
Email: ndag@nd.gov

Re: Notice of Data Security Incident

Dear Attorney General Stenehiem:

We represent Colton Telephone Company d/b/a COLTONTEL, a telecommunications provider located in Colton, Oregon. This letter is being sent on behalf of COLTONTEL because personal information belonging to one (1) North Dakota resident may have been affected by a recent data security incident. This information may have included the North Dakota resident's name and Social Security number.

On May 10, 2021, COLTONTEL learned of unusual activity involving an employee email account. Upon discovering this activity, COLTONTEL immediately took steps to secure the affected account and began an internal investigation. While the investigation identified unauthorized logins to the email account in early May 2021, it was not able to identify information within the account that may have been viewed or acquired. Out of an abundance of caution, COLTONTEL conducted an internal review of the entire contents of the email account in an effort to identify personal information that could have potentially been affected as a result of the incident. COLTONTEL's review concluded on June 7, 2021. Since that time, COLTONTEL has been working on gathering contact information needed to notify the potentially affected individuals. On July 15, 2021, COLTONTEL identified one (1) North Dakota resident within the potentially affected population.

COLTONTEL issued a notification letter to the potentially affected North Dakota resident via first-class U.S. mail on July 19, 2021. A sample copy of the notification letter is attached hereto.

COLTONTEL implemented additional safeguards to further secure the email environment and reduce the likelihood of a similar incident occurring in the future. These safeguards include blocking international access and working to deploy multi-factor authentication.

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COLTONTEL is also offering complimentary credit monitoring and identity theft protection services through IDX to all individuals whose personal information was potentially impacted by this incident, as an added layer of protection.

COLTONTEL is committed to protecting the personal information in its possession. If you have any questions or need additional information regarding this incident, please do not hesitate to contact me at (213) 680-5028 or via email at Robert.Slaughter@lewisbrisbois.com.

Very truly yours,

A handwritten signature in black ink, appearing to read "Robert L. Slaughter III", with a horizontal line extending from the end.

Robert L. Slaughter III of
LEWIS BRISBOIS BISGAARD & SMITH LLP

RLS:ALW

Attachment: Consumer Notification Letter Template



P.O. Box 1907
Suwanee, GA 30024

To Enroll, Please Call:
1-800-939-4170
Or Visit:
<https://app.idx.us/account-creation/protect>
Enrollment Code:
<<XXXXXXXX>>

<<First Name>> << Last Name>>
<<Address1>>
<<Address2>>
<<City>>, <<State>> <<Zip Code>>

July 19, 2021

Subject: Notice of Data <<variable 1>>

Dear <<First Name>> << Last Name>>:

I am writing to inform you of a data security incident that may have affected your personal information. At Colton Telephone Company d/b/a COLTONTTEL, we take the privacy and security of personal information very seriously. We are contacting you to notify you that this incident occurred and inform you about steps you can take to ensure your information is protected, including enrolling in the complimentary identity protection services we are making available to you.

What Happened? On May 10, 2021, COLTONTTEL learned of unusual activity involving an employee email account. Upon discovering this activity, COLTONTTEL immediately took steps to secure the affected account and began an internal investigation. While our investigation identified unauthorized logins to the email account in early May 2021, it was not able to identify information within the account that may have been viewed or acquired. Out of an abundance of caution, we conducted a review of the entire contents of the email account in an effort to identify personal information that could have potentially been affected as a result of the incident. COLTONTTEL's review concluded on June 7, 2021, and the review indicated that the email account contained some of your information in reference to your capital credit account at a COLTONTTEL associate entity, Monitor Telecom. Since that time, we have been working on gathering contact information needed to notify the potentially affected individuals.

Please note that this unauthorized access was limited to information transmitted via email and did not affect any other COLTONTTEL information systems. We are not aware of the misuse of any personal information that may have been involved in this incident.

What Information Was Involved? The potentially affected information may have included your <<variable2>>.

What Are We Doing? As soon as we discovered this incident, we took the steps described above. We have also implemented additional safeguards to help ensure the security of our email environment and to reduce the risk of a similar incident occurring in the future, including blocking international access and working to deploy multi-factor authentication.

In addition, we are providing you with information about steps you can take to help protect your personal information and, out of an abundance of caution, we are offering you credit monitoring and identity theft restoration services at no cost to you through IDX, the data breach and recovery services expert. IDX identity protection services include: 12 months of credit and CyberScan monitoring, a \$1,000,000 insurance reimbursement policy, and fully managed id theft recovery services. With this protection, IDX will help you resolve issues if your identity is compromised.

What Can You Do? We recommend that you review the guidance included with this letter about how to help protect your information. We encourage you to contact IDX with any questions and to enroll in free identity protection services by calling 1-800-939-4170 or going to <https://app.idx.us/account-creation/protect> and using the Enrollment Code provided above. IDX

representatives are available Monday through Friday from 6 am - 6 pm Pacific Time. Please note the deadline to enroll is October 19, 2021.

We encourage you to take full advantage of this service offering. IDX representatives are fully versed on the incident and can answer questions or respond to concerns you may have regarding the protection of your personal information.

For More Information: Further information about how to help protect your personal information appears on the following page. If you have questions or need assistance, please call our dedicated call center at 1-800-939-4170, Monday through Friday from 6 am - 6 pm Pacific Time.

We take your trust in us and this matter very seriously. Please accept our sincere apologies for any worry or inconvenience that this may cause you.

Sincerely,

Kelly Stephens

Kelly Stephens
President
COLTONTTEL

Geri Fraijo

Geri Fraijo
General Manager
COLTONTTEL

STEPS YOU CAN TAKE TO FURTHER PROTECT YOUR INFORMATION

Review Your Account Statements and Notify Law Enforcement of Suspicious Activity: As a precautionary measure, we recommend that you remain vigilant by reviewing your account statements and credit reports closely. If you detect any suspicious activity on an account, you should promptly notify the financial institution or company with which the account is maintained. You also should promptly report any fraudulent activity or any suspected incidence of identity theft to proper law enforcement authorities, your state attorney general, and/or the Federal Trade Commission (FTC).

Copy of Credit Report: You may obtain a free copy of your credit report from each of the three major credit reporting agencies once every 12 months by visiting <http://www.annualcreditreport.com/>, calling toll-free 1-877-322-8228, or by completing an Annual Credit Report Request Form and mailing it to Annual Credit Report Request Service, P.O. Box 105281, Atlanta, GA 30348. You also can contact one of the following three national credit reporting agencies:

Equifax

P.O. Box 105851
Atlanta, GA 30348
1-800-525-6285
www.equifax.com

Experian

P.O. Box 9532
Allen, TX 75013
1-888-397-3742
www.experian.com

TransUnion

P.O. Box 1000
Chester, PA 19016
1-800-916-8800
www.transunion.com

Fraud Alert: You may want to consider placing a fraud alert on your credit report. An initial fraud alert is free and will stay on your credit file for at least one year. The alert informs creditors of possible fraudulent activity within your report and requests that the creditor contact you prior to establishing any accounts in your name. To place a fraud alert on your credit report, contact any of the three credit reporting agencies identified above. Additional information is available at <http://www.annualcreditreport.com>.

Security Freeze: You have the right to put a security freeze on your credit file for up to one year at no cost. This will prevent new credit from being opened in your name without the use of a PIN number that is issued to you when you initiate the freeze. A security freeze is designed to prevent potential creditors from accessing your credit report without your consent. As a result, using a security freeze may interfere with or delay your ability to obtain credit. You must separately place a security freeze on your credit file with each credit reporting agency. In order to place a security freeze, you may be required to provide the consumer reporting agency with information that identifies you including your full name, Social Security number, date of birth, current and previous addresses, a copy of your state-issued identification card, and a recent utility bill, bank statement or insurance statement.

Additional Free Resources: You can obtain information from the consumer reporting agencies, the FTC, or from your respective state Attorney General about fraud alerts, security freezes, and steps you can take toward preventing identity theft. You may report suspected identity theft to local law enforcement, including to the FTC or to the Attorney General in your state.

Federal Trade Commission

600 Pennsylvania Ave, NW
Washington, DC 20580
consumer.ftc.gov, and
www.ftc.gov/idtheft
1-877-438-4338

Maryland Attorney General

200 St. Paul Place
Baltimore, MD 21202
oag.state.md.us
1-888-743-0023

New York Attorney General

Bureau of Internet and Technology
Resources
28 Liberty Street
New York, NY 10005
1-212-416-8433

North Carolina Attorney General

9001 Mail Service Center
Raleigh, NC 27699
ncdoj.gov
1-877-566-7226

Rhode Island Attorney General

150 South Main Street
Providence, RI 02903 <http://www.riag.ri.gov> 1-401-274-4400

Washington D.C. Attorney General

441 4th Street, NW
Washington, DC 20001
oag.dc.gov
1-202-727-3400

You also have certain rights under the Fair Credit Reporting Act (FCRA): These rights include to know what is in your file; to dispute incomplete or inaccurate information; to have consumer reporting agencies correct or delete inaccurate, incomplete, or unverifiable information; as well as other rights. For more information about the FCRA, and your rights pursuant to the FCRA, please visit <https://www.consumer.ftc.gov/articles/pdf-0096-fair-credit-reporting-act.pdf>.